

**State of Washington**  
**GOVERNOR'S SALMON RECOVERY OFFICE**  
**SALMON TEAM**

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July 6, 2000

**TO:** Independent Science Panel

**FROM:** Joint Natural Resources Cabinet

**SUBJECT: INDEPENDENT SCIENCE PANEL REVIEW OF THE STATEWIDE STRATEGY TO RECOVER SALMON**

As we all are aware, recovery of salmon is a serious natural resource challenge, one larger than the people of Washington have ever faced. There is a wide range of opinions about how best to proceed with salmon recovery. Complicating this situation, time may be of the essence for some especially vulnerable salmon populations, if they are to survive.

Science must play a key role as we begin to sort through the issues and uncertainty that surrounds how best to do salmon recovery. You, the Independent Science Panel (Panel), are one mechanism to help advance the scientific credibility of the State's salmon recovery efforts.

The Governor's Joint Natural Resources Cabinet (JNRC) developed the Strategy in September 1999 after eighteen months of work with our salmon recovery partners and the public. In November 1999, the Governor's Salmon Recovery Office asked you, from a scientific perspective, to review the 1999 Statewide Strategy to Recover Salmon (Strategy). Specifically, you were asked whether the concepts, elements, and approaches in the Statewide Strategy were the most efficient and effective for state agencies to undertake to begin the process of recovery.

We appreciate the thoughtful and thorough work of the Panel. You pointed out some of the strengths of the Strategy and found it had some weaknesses as well. You did what you were asked to do, and did it well. The JNRC has prepared this memo in response to your review.

In general, you concluded that the basic science in the Strategy was sound. In addition, you pointed out that yes, the Strategy is a good first step that, if implemented, should steer a course toward recovery. We are very encouraged by this feedback.

Although some of your comments were critical of the limited development of some aspects of the Strategy, we are very pleased that you offered comments on what it might take for us to move beyond not just the direction of recovery, but to actual recovery itself.

Your comments on the Strategy repeatedly touched on three major themes that we have addressed in this memo. The three themes are:

- The need for conceptual frameworks
- The purpose of a strategy compared to an implementation plan
- Voluntary and regulatory approaches

For each of these three categories, we have summarized your comments, and offer some thoughts about them.

## CONCEPTUAL FRAMEWORKS

**ISP Comment: Any salmon recovery effort should include a conceptual framework that clarifies the biological and physical requirements for recovery, as well as the social, economic, and political contexts in which recovery must occur.**

**JNRC Comment:** We agree that salmon recovery will require a conceptual framework to set the stage for what science can tell us in biological and physical terms, as well as what is actually doable, given a wide range of non-scientific considerations (e.g., social, economic, political). You suggested a very helpful conceptual framework in your review. The conceptual framework you suggested included identification of what is biologically and physically “possible” (science), what is “attainable” (policy), and what is “sustainable” (the intersection of science and policy). As you pointed out, in the final analysis, the real challenge we face is getting science and politics to act in concert. Much of what is contained in the Strategy resulted from use of this kind of science and policy analysis.

For example, the Panel criticized some aspects of the **Forests and Fish Agreement**. We could have (and will in the revision of the Strategy which is required by state law to begin in September of this year) better described its context, the scientific and policy processes used to achieve the agreement, and the detailed adaptive management component of the agreement. The process involved both identifying the “possible” via the active involvement of many state, federal, and tribal scientists, and resolving the “attainable” via dialogue among scientists, policy makers, and representatives of local government, and large and small landowners.

It is important to note that in the Forests and Fish Agreement, the scientific integrity of the adaptive management program “Closing the Loop,” is strong, accountable, and adequately funded. Implementation of the program is the responsibility of the state Forest Practices Board, with assistance from the Cooperative Monitoring and Evaluation and Research Committee, an independent scientific peer review committee, and the Forests and Fish Policy Committee. These boards or committees will interact to establish goals

and specific resource objectives, develop and implement research and monitoring projects, evaluate results of research, and take action to modify management practices or objectives as necessary to meet goals. The Forests and Fish Policy Oversight Group includes federal, state, tribal, county, and landowner representatives, and is open to any interested parties. The adaptive management program utilizes independent scientific peer review and dispute resolution mechanisms. Ultimately, the state Forest Practices Board is the authoritative entity responsible for the implementation of the Forests and Fish Agreement and achieving protection of fish and fish habitat on non-federal forested lands.

## STRATEGY AND APPROACH

**ISP Comment: The purpose of the Strategy wasn't clear. The Panel indicated in its review that not enough detail on implementation (funding, decision structures) was provided.**

**JNRC Comment:** It is our intention that the Strategy should serve as a roadmap, providing long-term guidance and direction for salmon recovery. In contrast, implementation plans will contain much more detail on specific actions being taken or to be taken.

For example, the **State Agencies' Action Plan** for the 1999 – 2001 Biennium was, built upon the Strategy. It is an implementation plan that details the state's priority actions for short-term implementation of the Strategy. The Action Plan provides details on specific commitments of state agencies, with related tasks, timelines, and budget information. It is intended to set priorities for state agency recovery efforts within this biennial budget. Similar action plans for state agencies will be prepared for each subsequent biennium.

In addition, the Joint Natural Resources Cabinet developed a performance tracking system for monitoring the implementation of the Action Plan. This effort is referred to as the **Salmon Recovery Scorecard**. Combined, we feel the Action Plan and scorecard will go a long way toward clarifying many implementation details of state agencies' actions that were outlined in the Strategy. These two key initiatives will be described in the upcoming revision of the Strategy.

**ISP Comment: The Panel's report concludes that the proposed Strategy is not likely to reverse the ongoing declines in salmon – that, in fact, extinction is an option.**

**JNRC Comment:** We acknowledge that the title of the Strategy may have unintentionally confused readers. When we say, "Extinction Is Not An Option," the intended message is that it is not an option to lose wild salmon as an integral part of life here in Washington. The fact is, more than 100 individual salmon populations have become extinct in the Pacific Northwest. More than 200 individual populations are currently at risk. In reality, we know some of these may be lost, but we must not allow

salmon and the cultural heritage they symbolize to be lost from our way of life. We will clarify our intended message in the revised Strategy.

**ISP Comment: The Strategy document does a good job of identifying causes of salmonid declines, but does not form an integrated, scientific strategy (e.g., goals, analysis, actions, monitoring) to effectively address the acknowledged causes.**

**JNRC Comment:** The Strategy was meant to represent an array of options, an umbrella, under which any number of approaches to addressing regional and watershed-scale salmon issues could be applied in the appropriate forum. We acknowledge there is more we can do, and will do, to improve the extent to which the actions identified in the Strategy are focused and integrated.

The Joint Natural Resources Cabinet and others have long recognized that delineation of numerical recovery goals will be very important to watershed and regional salmon recovery efforts. Such goals were not outlined in the Strategy because they were not yet available.

Since the 1999 Strategy was prepared, several efforts have begun that we hope will lead to establishment of clearly understood recovery goals. For example, the National Marine Fisheries Service (NMFS) has convened two Technical Recovery Teams in Washington that are working to identify delisting criteria/objectives for salmon in the Puget Sound region, and in the Lower Columbia region. This important work will be complemented with the efforts of the tribes and State Department of Fish and Wildlife, who also have been working to develop recovery objectives. Once the goals are established, more analyses will be conducted to explore and improve alternative approaches to achieve the goals, at both the regional and watershed scales.

Many elements of the state's efforts (e.g., Forests and Fish Agreement, Agriculture, Fish and Water Negotiations) have been strongly influenced by the available guidance from NMFS and the U. S. Fish and Wildlife Service regarding criteria for "Properly Functioning Conditions" and "Viable Salmonid Populations".

Comprehensive salmon recovery planning must involve both bottom-up and top-down components. There is a very delicate balance between leadership from the top and locally-driven, locally "owned" planning. While we may not have adequately described the integration between bottom-up and top-down approaches, we are committed to ensuring that factors for salmon declines associated with habitat, harvest, hatcheries, and hydropower (the 4Hs), are addressed at local, regional and statewide levels. We fully support the notion of state guidance integrated with the local and regional planning processes. Until the local and regional salmon recovery processes underway (i.e., in the Upper Columbia, Lower Columbia, and Puget Sound) have more time to put their recovery efforts into practice, it seems premature for the state to direct local interests on how to accomplish this. We are closely working with all regional efforts at merging the locally developed building blocks. In the revision of the Strategy, we will be able to

better describe the integration of the three levels of salmon recovery efforts (local, regional, and state) that are currently underway.

We appreciate the Panel's support for the basic outline of the monitoring program for the Strategy. Some of the detail sought by the Panel about implementation of the program, including funding and other commitments for the state components, will be included in future revisions of the State Agencies' Action Plan and related budgets. Additional detail on broader aspects of performance monitoring will be included in the Salmon Recovery Scorecard. Meanwhile, we look forward to the Panel's legislatively-required report on monitoring and data issues, to help improve this part of the Strategy.

#### VOLUNTARY AND REGULATORY APPROACHES

**ISP Comment: The Panel feels that in the past, voluntary approaches have not proved successful, and that unless there is a reason to expect a different outcome, reliance on them will slow down, but not reverse declines of salmon. The Panel indicated that a better explanation is needed regarding how the combination of voluntary actions coupled with more stringent enforcement of existing laws will actually recover salmon.**

**JNRC Comment:** You expressed concern that the context for relying on voluntary approaches in the Strategy was unclear and perhaps not warranted. We agree that we could have done a better job of explaining how voluntary and regulatory approaches will fit together. However, we maintain that salmon recovery will not succeed without a combination of voluntary actions and incentives, along with enforcement of laws and regulations.

In our view, successful recovery efforts will depend on landowners and the regulated community's active involvement and support of recovery. How these two approaches, voluntary and regulatory, work together has been deliberated at length by the Joint Natural Resources Cabinet and many others. The Joint Natural Resources Cabinet rejected the option of using a strictly voluntary approach as the sole approach. Instead, the Strategy outlines a variety of activities that, to varying degrees, rely on regulatory and non-regulatory approaches. It is true neither we, nor anyone else can predict whether these actions will lead to recovery. However, we made an expressed commitment in the strategy to use a bottom-up and top-down approach to salmon recovery. We will articulate this approach in more detail in the revised Strategy.

In closing, we again thank you for your valuable input. It can be difficult to open the door to criticism. But it is the right thing to do to help ensure our collective efforts are clearly expressed and on the track toward recovery of salmon.

We look forward to working with you on the issues you raised, to improve the Strategy as it enters its next phase.